

1 Scott L. Poisson, Esq.  
2 Nevada Bar No.: 10188  
3 Amber N. King, Esq.  
4 Nevada Bar No.: 14070  
**BERNSTEIN & POISSON**  
5 700 South Jones  
6 Las Vegas, Nevada 89107  
(702) 256-4566  
(702) 256-6280 fax  
7 Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ELISABETH LITCHFIELD, an individual,

Plaintiff,

v.

TARGET CORPORATION., and; DOES 1  
through 100; and ROE CORPORATION 101  
through 200, inclusive,

Defendant(s).

RFB-EJY

Case No.: 2:19-cv-01222-JAD-FJY

**STIPULATION AND ORDER  
REGARDING RESPONSE TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

Discovery on this matter closed on October 23, 2020. Prior to the close of discovery, Plaintiff requested the 30(b)(6) deposition of defendant's representative. However, due to scheduling conflicts and COVID related delays, the deposition has not been able to be scheduled prior to the October 23, 2020 discovery deadline. The parties have agreed to allow the deposition to take place after the close of discovery given the scheduling difficulties. The deposition will proceed forward on December 16, 2020.

On November 24, 2020, Defendant filed a Motion for Summary Judgment, ECF Document No. 26. The Court previously granted an extension of Plaintiff's response to January 6, 2021, due to the delay in obtaining dates for the Defendant's deposition.

1           The transcript of the deposition was received on January 30, 2020, however,  
2 counsel for Plaintiff has been ill due to contracting the COVID-19 virus and is requesting  
3 an additional week to be able to complete their response. Therefore, the parties have agreed  
4 and stipulate that the response to Defendant's Motion could be extended from January 6,  
5 2021 to January 13, 2021.  
6

7           **BERNSTEIN & POISSON**

8           **DATED: JANUARY 6, 2021**

9           **PERRY & WESTBROOK, P.C**

10           **DATED: JANUARY 6, 2021**

11           /s/ Amber N. King

12           Scott L. Poisson, Esq.  
13           Nevada Bar No.: 10188  
14           Amber N. King, Esq.  
15           Nevada Bar No.: 14070  
16           700 South Jones Blvd.,  
17           Las Vegas, Nevada 89107  
18           Attorneys for Plaintiff

19           /s/ Alan W. Westbrook

20           Alan W. Westbrook, Esq.  
21           Nevada Bar No. 6167  
22           Perry & Westbrook, a PC  
23           1707 West Charleston Blvd., Suite 200  
24           Las Vegas, NV 89102  
25           Attorneys for Defendant

26           **IT IS SO ORDERED:**

27             
28           

---

**RICHARD E. BOILWARE, II**  
**United States District Court**

29           DATED this 7th day of January, 2021.